
**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

DAVITA M. KEY,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2:19-CV-767-ECM
)	
HYUNDAI MOTOR)	
MANUFACTURING, ALABAMA,)	
LLC; HYUNDAI ENG AMERICA,)	
INC.; and DYNAMIC SECURITY,)	
INC.)	
)	
Defendants.)	

**PLAINTIFF’S OBJECTIONS TO DEFENDANT HYUNDAI ENG
AMERICA’S DEPOSITION DESIGNATIONS**

COMES NOW the Plaintiff, Davita Key, and gives notice to this Court of her objections to Hyundai Eng America’s (“HEA”) Deposition Designations. Plaintiff has attached a series of charts created in TranscriptPad for iPad as exhibits which set forth the specific designated testimony proposed by HEA. Specific objections will be made identifying the number on the far left column of each Exhibit Sheet.

Plaintiff’s Objections to HEA’s Deposition Designations
Key v. Hyundai Motor Manufacturing, et al
United States District Court for the Middle District of Alabama
Civil Action 2:19-CV-767-ECM

Designations for Deposition of Cassandra Williams, 30(b)(6) witness for Defendant, HEA (Attached as Exhibit “A”).

1. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

2. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

3. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

4. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

5. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

6. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

7. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

8. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

9. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

10. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

11. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

12.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

13.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

14.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

15.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

16.No Objection.

17.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

18.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

19.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

20.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

21.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

22.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

23.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

24.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

25.No objection.

26.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

27.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial. Plaintiff has no objection to the remainder of the content of this designation.

28.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

29.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

30.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

31.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

32.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

33.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

34.No Objection.

35.No Objection.

36.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

37.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

38.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

39.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

40.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

41.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

42.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

43. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

44. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

45. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

46. No Objection.

47. Plaintiff objects to this designation as the testimony taken out of context

will confuse and prejudice the jury under Rule 403. Applying the doctrine of completeness under Rule 106, Plaintiff proposes the addition of the context of the line of questioning making the designation 135:16-136:11 excluding the portions of attorney objections to form at 136:1.

48. Plaintiff objects to this designation. 146:17-147:1 is irrelevant and stands

to confuse and prejudice the jury. The hairstyles allowed at the deponents former place of employment decades before this deposition will confuse

the issues to the jury under rule 403. 147:2-147:9 elicits inadmissible hearsay.

49.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

50.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

51.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

ERRATA (Attached as Exhibit “B”) – Plaintiff objects to the designation of the ERRATA to the extent it changes substantive testimony. A deponent may not use ERRATA sheets to change the content of their testimony given under oath. Plaintiff does not object to the minor corrections of designated portions included in the ERRATA for misspellings but does object to the addition of words or phrases.

Designations for Deposition of Ray Cureton (Attached as Exhibit “C”).

1. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

2. Plaintiff objects to this designation as the testimony is taken out of context. The designation contains only an answer with no question. The inclusion of the contextual testimony is irrelevant and would confuse and prejudice the jury under Rule 403.

3. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

4. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

5. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

6. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial. Plaintiff has no objection to the remaining content of this designation.

7. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

8. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

9. No Objection.

10. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

11. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

12.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

13.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

14.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

15.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

16.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

17.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

18.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

19.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

20.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

21.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

22.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

23.Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

24. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

25. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

26. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

27. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

28. Plaintiff objects to this designation as the testimony taken out of context will confuse and prejudice the jury under Rule 403.

29. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

30. Plaintiff objects to this designation as unnecessary and irrelevant under Rule 403. The designation is an introduction of counsel prior to questioning the deponent.

31. Plaintiff objects to this designation as the testimony, taken out of context is confusing and prejudicial under Rule 403. The employment and/or agency relationship of another individual besides the deponent calls for the deponent to speculate and make legal conclusions and goes to the ultimate issues to be determined by the jury.

32. No Objection.

33. Plaintiff objects to this designation as the testimony is confusing and prejudicial under Rule 403. The testimony elicits the deponents opinion as to the employment relationship between a number of people and Defendants which is an ultimate issues to be decided by the jury. The designation also includes portions of counsel “recapping” or summarizing earlier testimony. Counsel was not under oath, is not on any witness list, and may not testify and/or present evidence as a witness.

34. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

35. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

36. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

37. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

Designations for Deposition of Sherry Spires, 30(b)(6) witness for

Defendant, Dynamic Security (Attached as Exhibit “D”)

1. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

2. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

3. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

4. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

5. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

6. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

7. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

8. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

9. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

10. Plaintiff objection to the inclusion of reading objections into the record.

Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

Designations for Deposition of Kristal Riddle, 30(b)(6) witness for

Defendant, Dynamic Security (Attached as Exhibit “E”)

1. No Objection.
2. No Objection.
3. Plaintiff objects to this designation as the testimony, taken out of context is confusing and prejudicial under Rule 403. Which parties had employment control over the Plaintiff goes to the ultimate issues to be determined by the jury.

4. Plaintiff objects to this designation as the testimony, taken out of context is confusing and prejudicial under Rule 403. Applying the doctrine of completeness under Rule 106, Plaintiff proposes the addition of the remaining line of questioning making the designation 77:20-78:18. The additional designation clarifies the witnesses knowledge of those with supervisory control over Plaintiff.
5. Plaintiff objects to this designation as incomplete and taken out of context under Rule 106 and proposes the addition of the witnesses answer and exclusion of objections making the designation 82:14-22, excluding the objections and attorney comments in lines 19-21.
6. No Objection.
7. Plaintiff objection to the inclusion of reading objections into the record. Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.
8. Plaintiff objects to this designation as confusing and prejudicial to the jury under Rule 403. The doctrine of completeness under Rule 106 provides clarity of the context making the entire designation 153:15-154:23 excluding objections to form at 154:15, and 154:20-21.

9. Plaintiff objects to this designation as the testimony, taken out of context is confusing and prejudicial under Rule 403. Which parties had employment control over the Plaintiff goes to the ultimate issues to be determined by the jury.
10. Plaintiff objects to this designation as irrelevant, confusing, and prejudicial to the jury. The deponent was testifying as a corporate representative under Rule 30(b)(6) not requiring personal knowledge.
11. Plaintiff objection to the inclusion of reading objections into the record. Under the stipulations of the deposition, all objections but to form or privilege are reserved for trial.

Respectfully submitted,

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/s/ Heather Leonard
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Certificate of Service

I hereby certify that I have filed the foregoing on the Court's CM/ECF electronic filing system which will provide notice to all counsel of record on this 9th day of February, 2023.

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